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Acting Under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                            |   |                             |
|----------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA,  | ) | Case No. CR 18-577 CRB      |
|                            | ) |                             |
| Plaintiff,                 | ) | [PROPOSED] SCHEDULING ORDER |
|                            | ) |                             |
| v.                         | ) |                             |
|                            | ) |                             |
| MICHAEL RICHARD LYNCH AND  | ) |                             |
| STEPHEN KEITH CHAMBERLAIN, | ) |                             |
|                            | ) |                             |
| Defendants.                | ) |                             |

The Government and Defendants Michael Richard Lynch and Stephen Keith Chamberlain respectfully submit this proposed schedule following the scheduling conference held on June 27, 2023, and in light of the March 18, 2024 trial date.

1. On or before August 8, 2023, the United States shall provide a list of alleged co-conspirators including alleged co-conspirators in relation to the conspiracy alleged in Count 17. (This commitment is without prejudice to any arguments the United States may raise in opposition to any motion for a bill of particulars.)

2. On or before August 8, 2023, the United States shall provide a preliminary witness list indicating the witnesses it presently intends to call in its case-in-chief. (The United States may amend

1 its list as it prepares for trial.)

2 3. On or before September 22, 2023, the parties will meet and confer regarding potential  
3 Rule 15 and Rule 12 motions.

4 4. On or before September 29, 2023, pretrial motions pursuant to Rule 12 of the Federal  
5 Rules of Criminal Procedure and Rule 15 motions for foreign depositions are to be filed.

6 5. On or before October 13, 2023, oppositions to Rule 12 and Rule 15 motions are to be  
7 filed.

8 6. On or before October 20, 2023, replies in support of Rule 12 and Rule 15 motions are to  
9 be filed.

10 7. On or before October 30, 2023, the United States shall identify any evidence it anticipates  
11 seeking to admit under Rule 404(b) of the Federal Rules of Evidence.

12 8. On November 1, 2023, any Rule 12 and Rule 15 motions shall be heard by the Court.

13 9. On or before November 8, 2023, the United States shall serve a summary pursuant to  
14 Rule 16 of the Federal Rules of Criminal Procedure for each expert witness that it intends to call at trial  
15 in its case-in-chief.

16 10. On or before November 23, 2023, the United States shall serve its witness list.

17 11. On or before December 7, 2023, the United States shall serve its exhibit list.

18 12. On or before December 7, 2023, each Defendant shall serve a summary pursuant to Rule  
19 16 of the Federal Rules of Criminal Procedure for each expert witness that he intends to call at trial in  
20 his case-in-chief.

21 13. On or before January 3, 2024, the United States shall serve a summary pursuant to Rule  
22 16 of the Federal Rules of Criminal Procedure for each expert witness that it intends to call at trial in  
23 rebuttal to expert testimony offered by any Defendant.

24 14. On or before January 3, 2024, Defendants shall complete their disclosures required by  
25 Rule 16 of the Federal Rules of Criminal Procedure.

26 15. On or before January 10, 2024, proposed juror questionnaires are to be filed.

27 16. On or before January 17, 2024, motions in limine are to be filed.

28 17. On or before January 31, 2024, oppositions to motions in limine are to be filed.

18. On or before February 7, 2024, replies in support of motions in limine are to be filed.

19. On or before February 14, 2024, pretrial conference statements, proposed voir dire questions, proposed jury instructions, and proposed verdict forms are to be filed.

20. On February 21, 2024, motions in limine shall be heard by the Court, and the Court shall hold a pretrial conference.

21. On March 13, 2024, jury selection shall commence. On each day of jury selection, following jury selection, the Court shall hold hearings on remaining pretrial issues as necessary.

22. On March 18, 2024, trial shall commence.

23. On March 25, 2024, Defendants shall serve their witness and exhibit lists.

DATED: June 29, 2023

THOMAS A. COLTHURST  
Attorney for the United States Attorney  
Acting Under Authority Conferred by  
28 U.S.C. § 515

By: Robert S. Leach

ROBERT S. LEACH  
ADAM A. REEVES  
Assistant United States Attorneys

DATED: June 29, 2023

STEPTOE & JOHNSON LLP

By: /s/

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Attorneys for Defendant  
Michael Richard Lynch

1 DATED: June 29, 2023

CLIFFORD CHANCE US LLP

2  
3 By: /s/

4 CHRISTOPHER J. MORVILLO  
5 CELESTE KOELEVELD  
6 DANIEL SILVER  
7 Attorneys for Defendant  
Michael Richard Lynch

8 DATED: June 29, 2023

BIRD, MARELLA, BOXER, WOLPERT, NESSIM,  
DROOKS, LINCENBERG & RHOW, P.C.

9  
10  
11 By: /s/

12 GARY S. LINCENBERG  
13 RAY S. SEILIE  
14 MICHAEL C. LANDMAN  
Attorneys for Defendant Stephen Keith Chamberlain

15 **[PROPOSED] SCHEDULING ORDER**

16 The Court HEREBY ORDERS the schedule set forth above.

17 IT IS SO ORDERED.

18 Date:

19 THE HONORABLE CHARLES R. BREYER  
20 UNITED STATES DISTRICT JUDGE  
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